

REMARKS

The drawing and specification objections in paragraphs 2, 3 and 4 of the office action in the parent application were addressed in the Preliminary Amendment filed with this case. An inadvertent error in the Preliminary Amendment has been corrected in this amendment.

In this paper, the title has been amended and the claims have been amended to overcome the outstanding § 112 rejections, without narrowing the scope of the claims. Claims 1 and 14 have been canceled without prejudice.

Claims 2, 11 and 15 stand rejected under § 102 on the basis of Carey et al. Claim 2 has been amended to overcome this rejection, and applicants traverse because Carey does not disclose (or suggest) a constraining member that is fixed to the chassis so that the constraining force is exerted from the chassis to a lift plate, as in amended claim 2.

The constraining mechanism (leaf springs 41b, 42b) of Carey et al. is fixed on a lift plate, as seen in Fig. 6B. In contrast, the constraining mechanism of the present invention is attached to the chassis (see Fig. 12, leaf springs 13, 14). There is no disclosure or suggestion to modify the reference in this manner, to arrive at the present invention. Withdrawal of this rejection is respectfully requested.

Claims 2, 11 and 16 stand rejected under § 102 on the basis of Verheyen. Applicants traverse this rejection because Verheyen merely discloses a coil spring that supports the device 37 in a resilient condition. The spring does not constrain the lift plate, as in the present invention. Withdrawal of this rejection is also requested.

For the foregoing reasons, applicants believe that this case is in condition for allowance, which is respectfully requested. The examiner should call applicants' attorney if an interview would expedite prosecution.

Respectfully submitted,

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